

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**In re: Procter & Gamble Aerosol Products
Marketing and Sales Practices Litigation**

Case No. 2:22-md-3025
Judge Michael H. Watson
Magistrate Judge Chelsey Vascura

This document relates to: ALL CASES

NOTICE OF SETTLEMENT

Plaintiffs Norma Bernsee, Abby Nelson, Shirley Thiele, Lindsey Labella, Erica Esquivel, Joshua Wallace, Tyler Baker, Brian Stanfield, Eileen Aviles, Shelby Cooper, Tanya Cooper, Jacob Cooper, Patricia Donadio, James Dethrow, Gregory Pickens, Ryan Rinz, Patricia Kelley, Jeremy Wilson, Dante Melendez, Darrell Stewart, Beth Blake, Angela Hernandez, Lynn Balser Mills, Matthew Lopez, Erik Velasques, Frank Ortega, Nancy Martinez, Evan Clarke, and Lagregory Bonner (collectively “Plaintiffs”) and Defendant The Procter & Gamble Company (“Defendant” or “P&G”) jointly notify this Court that they have reached an agreement in principle to settle the claims asserted in Plaintiffs’ complaints against P&G on a nationwide, class-wide basis. The intention of the settlement is that, if the settlement is approved by this Court, the settlement will resolve all of the claims in all of the actions that have been centralized into MDL No. 3025.¹

Counsel for these Plaintiffs and Defendant intend to discuss the next steps in the settlement process with the Court at the May 3, 2022 telephonic status conference. Counsel for

¹ This includes a putative class action filed in the Southern District of Ohio on May 2, 2022 that has not yet been assigned to this Court. *See Casolari v. The Procter & Gamble Co.*, No. 22-cv-00235-SJD (S.D. Ohio).

the parties are working on executing a comprehensive settlement agreement. They anticipate that the settlement and a motion for preliminary approval of the settlement will be filed on or before June 2, 2022.

Dated: May 3, 2022

Respectfully submitted,

/s/ Richard S. Wayne

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Kelley et al. v. Procter & Gamble Co., Case No. 1:21-cv-00785

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*Bernsee et al. v. Procter & Gamble Co., Case
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Aviles et al. v. Procter & Gamble Co., Case No.
2:22-cv-01950*

**Subject to Pro Hac Vice admission*

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Esquivel et al. v. Procter & Gamble Co., Case No. 1:21-cv-00762

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*Hernandez v. Procter & Gamble Co., Case No
3:22-cv-00080 (D.S.C.)
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cv-00044*

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing document was served via the Court's CM/ECF system on May 3, 2022, and has thus been served automatically on all counsel of record that have entered an appearance in Case No. 2:22-md-3025.

/s/ Richard S. Wayne

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